REMARKS

Claims 1-30 are pending in the present application. Claims 1 -30 stand rejected under 35 USC 103 (a) as being unpatentable Shah et al. (U.S. Pat. No. 6,088,648) and Babbin et al. (U.S. Pat. No. 5,945,985) and Torres et al. (U.S. Pat. No. 6,608,650). The following reviews the specific grounds asserted for rejecting claim 1 and establishes that the cited references do not support the grounds for rejection.

I. Claims 1-15:

Regarding claim 1, the Office Action contends the following:

1. Shah et al. show a method for browsing and retrieving images in a database via a graphic user interface (Fig. 5).

Shah et al. describes generally a method and apparatus for tracking vehicle location comprising an integrated system which displays a raster map and vectorized street information corresponding to a vehicle position operably coupled to a computer aided dispatch system is provided. The [Shah et al.] system provides an easy to view display with easy to use computer aided dispatch system for fleet management and the like applications. (Shah et al. at column 4, lines 35 - 46.).

a. Fig. 5

Specifically, what is shown in Fig. 5 is described as follows in the '648 patent:

> *FIG. 5 illustrates an integrated raster map display and vector information display according to an embodiment of thepresent invention. The raster map 510 includes natural features such as marshlands 512, creeks 514, and the like.*
>
> *The raster map 510 also includes man-made features such as the Auto Assembly Plant 516, Agnews Hospital 518,and others. The raster map is, for example, a digitally scanned road map, a digitally scanned automobile road map, a raster image in digital form, a pre-existing digital map without intelligent information, a digital map in TIFF format, a digitized video image, a digitized satellite image, or the like. Of course, the raster map can also generally be almost any type of digital map with substantially clear features without intelligent street information or the like.*
>
> *Icons 520 show the position of the vehicles identified in the vector information table 528. But it will be recognized that the icons can also represent any mobile entities such as automobiles, vans, trucks, ambulances, animals, people, boats, ships, motorcycles, bicycles, tractors, moving equipment, trains, courier services,*

container ships, shipping containers, airplanes, public utility vehicles, telephone company vehicles, taxi cabs, buses, milk delivery vehicles, beverage delivery vehicles, fire trucks and vehicles, hazardous waste transportation vehicles, chemical transportation vehicles, long haul trucks, local haul trucks, emergency vehicles, and the like. The icons can represent any mobile or potentially mobile entity or the like.

The vector information table 528 indicates selected geographic and cartographic information retrieved from, for example, the vector database. The vector information table 528 provides intelligent street information such as block number, address information, nearest cross-section of major streets, and the like with reference to the vehicle position. The vector table can also provide information about vehicle speed, vehicle heading, an activity status, a time status, and the like.

The display shown in FIG. 5 can be divided into at least two regions or segments such as a raster display segment 530, a vector information display segment 532, and others. The raster display segment 530 includes a first and second axis 534, 536 representing the latitudinal and longitudinal position of the vehicle position, respectively. Alternatively, the raster display segment may be in cylindrical or polar coordinates, and may not be limited to two dimensions.

A digitized map of the region through which the vehicle travels is displayed in the first segment of the display 530,adjacent to the first and second axis 534, 536. As noted above, each vehicle is represented as an icon. The icons may be color coded relative to a status chart and the like. Of course, the shape and color of each icon depend upon the particular application. (Shah et al. column 4, lines 51-68 and column 5, lines 1-35.)

It will be appreciated from this that the only image presented in Shah et al. is that of a raster map that has movable icons superimposed onto it to show the position of moving vehicles and relevant man made features.

<u>2. *including: receiving a digital image (column 3, lines 43-50),*</u>

a. Column 3, lines 43-50

Column 3, lines 43 - 50 of Shah et al. states as follows:

A further specific embodiment provides a method of using a computer aided dispatch apparatus. The present method includes providing a display having a first display segment. The first display segment includes a digitized representation of a raster map, and the first display segment further includes intelligent street data. The present method also includes displaying a user

locatable mark onto the digitized representation. The user locatable mark defines a mobile unit location having a first value and a second value. The mobile unit location corresponds to a mobile unit. A step of using a computer dispatch system operably coupled to the first display segment to provide an order to the mobile unit is also included.

There is no step described in this cited portion of Shah et al. of receiving a digital image. A raster map is described however, there is no discussion of that raster map having been received.

<u>3. receiving position information in the form of metadata corresponding to a geographical location where the real object represented by an image is determined (column 4, lines 45-65).</u>

This is believed to be a paraphrased version of a claim step that reads "receiving position information in the form of metadata corresponding to a geographical location where said digital image is captured." This pharaphrased form of the step omits the claimed idea that the position information correspond[s] to a geographical location where said digital image is captured. The cited lines of the '648 reference do not teach or suggest this step. Specifically, column 4, lines 40 - 65 and column 5, lines 1-10 state as follows

FIG. 5 illustrates an integrated raster map display and vector information display according to an embodiment of the present invention. The raster map 510 includes natural features such as marshlands 512, creeks 514, and the like.

The raster map 510 also includes man-made features such as the Auto Assembly Plant 516, Agnews Hospital 518, and others. The raster map is, for example, a digitally scanned road map, a digitally scanned automobile road map, a raster image in digital form, a pre-existing digital map without intelligent information, a digital map in TIFF format, a digitized video image, a digitized satellite image, or the like. Of course, the raster map can also generally be almost any type of digital map with substantially clear features without intelligent street information or the like.

Icons 520 show the position of the vehicles identified in the vector information table 528. But it will be recognized that the icons can also represent any mobile entities such as automobiles, vans, trucks, ambulances, animals, people, boats, ships, motorcycles, bicycles, tractors, moving equipment, trains, courier services, container ships, shipping containers, airplanes, public utility vehicles, telephone company vehicles, taxi cabs, buses, milk

delivery vehicles, beverage delivery vehicles, fire trucks and vehicles, hazardous waste transportation vehicles, chemical transportation vehicles, long haul trucks, local haul trucks, emergency vehicles, and the like. The icons can represent any mobile or potentially mobile entity or the like.

Assuming for the purpose of argument that the raster map 510 of Shah et al. corresponds to the digital image of claim 1, there is still no teaching or suggestion that position information is received in the form of metadata corresponding to a geographical location *where said digital image is captured.* Instead it is clear that the location where the raster map is captured is not important to the '648 patent, rather what is important is the location that is represented by what is shown in the raster map. Further, it will be appreciated that the '648 patent would be inoperative if the rasterized map is associated with metadata indicating where the raster map is captured.

4. storing digital images and associated metadata in the database (column 5, lines 5-35, column 6 lines 65-67).

a. Column 5, lines 5-35

Column 5, lines 5 - 35 of the '648 patent are part of a larger section of the '648 patent that begins at column 4, lines 65 and ends at column 5, line 35, and that read as follows:

Icons 520 show the position of the vehicles identified in the vector information table 528. But it will be recognized that the icons can also represent any mobile entities such as automobiles, vans, trucks, ambulances, animals, people, boats, ships, motorcycles, bicycles, tractors, moving equipment, trains, courier services, container ships, shipping containers, airplanes, public utility vehicles, telephone company vehicles, taxi cabs, buses, milk delivery vehicles, beverage delivery vehicles, fire trucks and vehicles, hazardous waste transportation vehicles, chemical transportation vehicles, long haul trucks, local haul trucks, emergency vehicles, and the like. The icons can represent any mobile or potentially mobile entity or the like.

The vector information table 528 indicates selected geographic and cartographic information retrieved from, for example, the vector database. The vector information table 528 provides intelligent street information such as block number, address information, nearest cross-section of major streets, and the like with reference to the vehicle position. The vector table can also provide information about vehicle speed, vehicle heading, an

activity status, a time status, and the like.

The display shown in FIG. 5 can be divided into at least two regions or segments such as a raster display segment 530, a vector information display segment 532, and others. The raster display segment 530 includes a first and second axis 534, 536 representing the latitudinal and longitudinal position of the vehicle position, respectively. Alternatively, the raster display segment may be in cylindrical or polar coordinates, and may not be limited to two dimensions.

A digitized map of the region through which the vehicle travels is displayed in the first segment of the display 530, adjacent to the first and second axis 534, 536. As noted above, each vehicle is represented as an icon. The icons may be color coded relative to a status chart and the like. Of course, the shape and color of each icon depend upon the particular application.

b. Column 6, lines 59-67

Column 6, lines 59 - 67 and column 7, lines 1-10 state as follows:

The vehicle display system includes at least three databases (a mobile position database 614, a raster database 645 and a vector database 631). The database information is interrelated by common latitude and longitude position data. A mobile tracking station 626 displays the position, raster and vector information in a format easily understood by the dispatcher or fleet manager.

The raster database is described as follows:

The second database, the raster database 645, is generated by digitally scanning a standard road map or paper map. The raster database 645 contains a digitized version of the visual features of the land for a specified region. Digitized raster information is stored in the raster database 645 in data records. Each data record corresponds to a digitized region having a particular latitude and longitude value. The latitude and longitude values are used as a locator field for accessing the raster database 645. (column 7, lines 11-19)

Thus the cited portions of Shah et al. describe a database of images of a geographic location and metadata that describes the location depicted by the image. Shah et al. does not describe a database that indicates a location where the rasterized image was captured. For example, the raster database 645 of Shah et al. can contain images of streets in New Jersey. For example, such images will have location metadata associated with New Jersey latitudes and longitudes without regard as to where the images were actually captured i.e. where the road map was actually scanned. Thus, Shah et al. teaches away from receiving

position information in the form of metadata corresponding to a geographical location where a digital image is captured and storing the digital images and metadata in a picture database.

5. generates a main display level having a first geographical metaphor with 'picture' icons each corresponding to a group at said database at a specific location in the geographical database at a specific location in the geographical metaphor (Fig. 5, column 5, lines 20-40, column 6, lines 30-52).

This appears to be a paraphrased version of a claim element that reads "generating a main display level having a first geographical metaphor with picture icons, each said picture icon corresponding to a group of pictures in said picture database captured at a specific location in said first geographical metaphor." The following reviews the grounds for this assertion:

> ***a. Fig. 5***
>
> *FIG. 5 illustrates an integrated raster map display and vector information display according to an embodiment of the present invention. The raster map 510 includes natural features such as marshlands 512, creeks 514, and the like.*
>
> *The raster map 510 also includes man-made features such as the Auto Assembly Plant 516, Agnews Hospital 518, and others. The raster map is, for example, a digitally scanned road map, a digitally scanned automobile road map, a raster image in digital form, a pre-existing digital map without intelligent information, a digital map in TIFF format, a digitized video image, a digitized satellite image, or the like. Of course, the raster map can also generally be almost any type of digital map with substantially clear features without intelligent street information or the like.*
>
> *Icons 520 show the position of the vehicles identified in the vector information table 528. But it will be recognized that the icons can also represent any mobile entities such as automobiles, vans, trucks, ambulances, animals, people,boats, ships, motorcycles, bicycles, tractors, moving equipment, trains, courier services, container ships, shipping containers, airplanes, public utility vehicles, telephone company vehicles, taxi cabs, buses, milk delivery vehicles, beverage delivery vehicles, fire trucks and vehicles, hazardous waste transportation vehicles, chemical transportation vehicles, long haul trucks, local haul trucks, emergency vehicles, and the like. The icons can represent any mobile or potentially mobile entity or the like.*

b. column.5 lines 20-40

Column 5, lines 20- 35 of Shah et al. are part of a larger section that read as follows:

> *Icons 520 show the position of the vehicles identified in the vector information table 528. But it will be recognized that the icons can also represent any mobile entities such as automobiles, vans, trucks, ambulances, animals, people, boats, ships, motorcycles, bicycles, tractors, moving equipment, trains, courier services, container ships, shipping containers, airplanes, public utility vehicles, telephone company vehicles, taxi cabs, buses, milk delivery vehicles, beverage delivery vehicles, fire trucks and vehicles, hazardous waste transportation vehicles, chemical transportation vehicles, long haul trucks, local haul trucks, emergency vehicles, and the like. The icons can represent any mobile or potentially mobile entity or the like.*
>
> *The vector information table 528 indicates selected geographic and cartographic information retrieved from, for example, the vector database. The vector information table 528 provides intelligent street information such as block number, address information, nearest cross-section of major streets, and the like with reference to the vehicle position. The vector table can also provide information about vehicle speed, vehicle heading, an activity status, a time status, and the like.*
>
> *The display shown in FIG. 5 can be divided into at least two regions or segments such as a raster display segment 530, a vector information display segment 532, and others. The raster display segment 530 includes a first and second axis 534, 536 representing the latitudinal and longitudinal position of the vehicle position, respectively. Alternatively, the raster display segment may be in cylindrical or polar coordinates, and may not be limited to two dimensions.*
>
> *A digitized map of the region through which the vehicle travels is displayed in the first segment of the display 530, adjacent to the first and second axis 534, 536. As noted above, each vehicle is represented as an icon. The icons may be color coded relative to a status chart and the like. Of course, the shape and color of each icon depend upon the particular application.*

c. column 6 lines 30-52:

Column 6, lines 30 - 52 of the Shah et al. patent are part of a larger portion of the Shah et al. patent which read as follows:

> *The fleet process 644, a UNIX based process or the like, is the user interface display process. The fleet process 644 receives mobile position information and street text information from the mobile information data process 630. In addition, the fleet process 644*

accesses the raster database 645 through the raster map utilities 646.

The raster map utilities 646 match the latitude and longitude mobile position 648 from the fleet MDS 611 to the various digitized raster maps data 650 in the raster map database 645. By specifying the zoom level option, using as an example, the X11/Motif graphical user interface on the mobile tracking station 626, the digitized raster map is displayed in one display window segment 530 and the corresponding street text information on another display window segment 532 shown in FIG. 5. A user locatable mark 520 represents the fleet MDS position for a particular vehicle. The icon 520 is positioned at the corresponding latitude and longitude location on the raster map display 530.

Historical data requests may be made by specifying a particular time period and a particular fleet MDS 611. The data request is sent by the fleet process 644 to the mobile information data process 630. The mobile information data (MID) process 630 in turn sends a request 628 to the DBRQSRV 624 process. The DBRQSRV 624 process accesses the disk database 622 and retrieves reports for the specific time period and fleet MDS 611. For every historical report sent back to the MID process 630, the above described process flow for accessing and displaying the raster map, vector street information, and displaying the user locatable mark representing the position of the navigational system is followed.

There is simply no suggestion of capturing digital images or of receiving information regarding where the digital images have been captured. Further there is no discussion of providing a main display level having a first geographical metaphor with 'picture' icons each corresponding to a group at said database at a specific location in the geographical database at a specific location in the geographical metaphor. What is described in Shah et al. is showing a regional map with icons that indicate the position of landmarks and the position of vehicles.

6. The Shah et al. do not specifically show how digital images are captured pictures, in which it would then follow that the position information is where the image was captured, (column 5, lines 27 - 35).

As the applicants understand this assertion, it is the position of the Office Action that Shah et al. does not specifically show how digital images are captured pictures. However, the Office Action also appears to assert that if Shah et al. did

discuss capturing digital images, it would naturally follow from Shah et al. to store the digital image and position information indicating where the image is captured in the database.

The applicants respectfully disagree with both this premise and the conclusion. Specifically, the applicants point out that Shah et al. does specifically show the use of captured pictures. In particular, the applicants refer to column 4 of the Shah et al. reference at lines 35-46 which state in pertinent part that:

> *The raster map is, for example, a digitally standard road map, a digitally scanned automobile roadmap, a raster image in digital form, a pre-existing digital map without intelligent information, a digital map in TIFF format, a digitized video image, a digitized satellite image, or the like.*

Accordingly, Shah et al. explicitly describes the use of digital images for the raster map but does not describe the association of information regarding where such digital images are captured with the digital images.

Instead, Shah et al. specifically describes associating the raster map with latitude and longitude information reflecting the exact latitude and longitude at which the subject matter of each raster map exists so that they can be used in the tracking system provided in Shah et al.

7. but do mention representing the object by digital icon or marketed established the object

Shah et al. describe representing objects using one or more digital icons as follows:

> *Icons 520 show the position of the vehicles identified in the vector information table 528. But it will be recognized that the icons can also represent any mobile entities such as automobiles, vans, trucks, ambulances, animals, people, boats, ships, motorcycles, bicycles, tractors, moving equipment, trains, courier services, container ships, shipping containers, airplanes, public utility vehicles, telephone company vehicles, taxi cabs, buses, milk delivery vehicles, beverage delivery vehicles, fire trucks and vehicles, hazardous waste transportation vehicles, chemical transportation vehicles, long haul trucks, local haul trucks, emergency vehicles, and the like. The icons can represent any mobile or potentially mobile entity or the like.*

However, claim 1 of the pending application does not claim the feature of representing objects using one or more digital icons. Instead, picture icons are provided, each picture icon corresponding to a group at pictures in a picture database. Nothing of this type is taught or suggested by Shah et al. To the extent the Office Action contends that Shah et al. describes a database for storing digital raster maps used for mapping, Shah et al. fails to show any icon that represents a group of the stored digital raster maps used for mapping.

In summary, close examination of the Shah et al. reference shows that there is no support for the contention that the Shah et al. reference describes the method steps of receiving position information on the form metadata corresponding to the geographical location where a digital image is captured. To the contrary, Shah et al. describes the capture of a digital image i.e. a digitized video image or satellite image but only describes associating location information indicating the geographic location that is depicted in the image. Accordingly, Shah et al. teaches away from the present invention.

Shah et al. further fails to describe storing digital images and associated metadata (corresponding to the geographical location where said digital images captured) in a database. Here again, Shah et al. would teach the away from this by explicitly teaching associating position information with the image that depicts the area represented by the image.

8. In addition, Torres et al. to show capturing digital images to represent objects and storing them as pictures in a database for browsing and retrieving (Figs. 6, and 7, column 3, lines 40-55, column for lines 53-67, column 6, lines 9-13).

The Torres et al. patent describes a system and method for providing user assistance to a user of a digital image device. The invention is directed to an image or active content assistant including a computer readable instruction stored in a memory unit of a digital image device which are executed by a central processing unit. The Torres et al. system is configured to automatically recognize an attribute of image data and has a database which specifies user assistance to be provided to a user of the imaging device based upon the attribute of the image data. Torres et al. does not supply the teachings that are missing from the Shah et al. reference.

Figs. 6 and 7 of Torres describe respectively a block diagram illustrating the interaction between the components and modules in digital camera 110 (FIG. 1) that are associated with providing user assistance in accordance with the present invention and a process 700 for providing user assistance via image analysis. As is stated at column 11, lines 30-68, column 12, lines 1-68, and column 13, lines 1-4.

> *Process 700 is implemented as computer-readable program instructions stored in non-volatile memory 350 and executed by computer 118 (i.e., CPU 344) in digital camera 110 (FIG. 1). Process 700 is described for a case primarily involving data-based information; however, as discussed above, the present invention is also suited for other types of information.*
>
> *In step 705, the image to be analyzed in accordance with the present invention is identified. The image can be either an image that has just been captured and is being displayed to the user on LCD 402 (FIG. 2A), or it can be an image taken earlier and then stored as previously described herein. In step 710, the user indicates if user assistance through the present invention interactive context assistant is desired. Alternatively, the interactive context assistant automatically is implemented. As discussed above, the user also has the option to deactivate the interactive context assistant. Note that this step can also be completed during start-up.*
>
> *In step 715, depending on the response from step 710, the captured image is analyzed using an image processing module in toolbox 373 (FIG. 3). For example, in the present embodiment, a matrix analysis is performed of the image by breaking the image down into zones, and then each zone is analyzed in comparison with the surrounding zones. The analysis also includes the identification tags assigned to the image data as described previously herein. These identification tags indicate whether the image is categorized as an image of a person or a landscape, for example. The identification tags also provide details regarding the state of digital camera 110 when the image was captured; that is, the identification tags provide information regarding the camera settings, exposure time, shutter speed, white balance values, f-stops, and focus distance. Hence, a plethora of information is available to assist in the analysis of the image. The matrix analysis is thereby cued to anticipate a particular pattern of shade and light, among other attributes, and it then compares the image against that particular pattern. The matrix analysis next assesses the quality of the image and intelligently makes suppositions regarding the attributes of the image data (e.g., brightness, sharpness, contrast, and color).*
>
> *With reference back to FIG. 6, the attributes of the image data derived from the intelligent analysis of step 715 are correlated by*

interactive context assistant 460 to recognize conditions (e.g., condition 510 of FIG. 6) that are in turn used as the basis for defining the user assistance to be provided. By matching the attributes of the image data against the conditions contained in database 470, the proper conditions are recognized and the associated rules, etc., are used to formulate query 640.

With reference again to FIG. 7, in step 720, interactive context assistant 460 communicates query 640 to the user. Thus interactive context assistant 460 automatically communicates its suppositions regarding the captured image data to the user, in accordance with the rules, questions, etc., contained in database 470. As discussed above, the communication can occur via an audible message, a visual display, or any other suitable means. The user responds via buttons or soft keys (refer to FIGS. 2A and 2B), and the software modules in toolbox 373 (e.g., the menu and dialogue manager of FIG. 3) read the user's responses and forward them to interactive context assistant 460. Based on the responses, interactive context assistant 460 modifies its suppositions regarding the attributes of the image data.

In step 725, interactive context assistant 460 automatically refines its suppositions and conclusions and achieves a satisfactory conception of the captured image that is consistent with the user's input.

In step 730, in the present embodiment, interactive context assistant 460 again communicates with the user, providing a summary report of the results of the analysis of the captured image.

In step 735, interactive context assistant 460 continues the process of providing user assistance. Again, using the rules, etc., from database 470 associated with the conditions (e.g., image data attributes) derived from the image analysis, the user is automatically queried regarding whether the user is satisfied with the image. At this point, the user is also queried regarding which attributes of the image the user is satisfied with, and which attributes the user would like to see improved. The user is also queried regarding whether or not he/she would like to recapture the image.

In step 740, based on the user's responses from step 735, interactive context assistant 460, using the rules, etc., from database 470, specifies new camera settings to improve the quality of the captured image. In one embodiment, the new camera settings are automatically implemented by interactive context assistant 460.

In step 745, the image is recaptured as described previously in conjunction with FIGS. 2A and 2B.

In step 750, the recaptured image is compared to the preceding captured image using an image processing module in the manner described previously in conjunction with step 715. At this point,

> *interactive context assistant 460 again queries the user as described by step 735 above, and the interaction between the present invention and the user continues until a satisfactory image is captured.*
>
> *Thus, in the manner described above in conjunction with FIGS. 6 and 7, the present invention uses advantageously the richness of the data available with a digital camera. The present invention provides the capability to analyze the data and what the data represent, and makes recommendations to the user based on the data analysis. The present invention analyzes the data in the contexts in which the data were acquired and are being used, and can suggest improvements to the user based on those contexts.*

It is clear from this that Torres et al. describes a digital camera system that provides recommendations to the user based upon analysis of an image capture scene. The only database described in Torres et al. is a database 470. According to Torres et al. database 470 contains "a set of predetermined conditions defining when user assistance is required, and a set of rules, scripts, and other like information that define the user assistance to be provided corresponding to each of the predetermined conditions." Torres et al. also fails to suggest receiving position information in the form metadata corresponding to the geographical location where said digital image is captured.

The Office Action contends that it would have been obvious to a person with ordinary skill the art to have capturing digital images to represent objects and storing them as pictures in a database for browsing and retrieving, in Shah et al. because it would provide a convenient way to represent an object digitally to distinguish it. Thus the combination assembled in the Office Action appears to describe the idea of using a picture of a vehicle in lieu of an icon of the vehicle in the tracking system described Shah et al. This combination of course does not meet the claim 1 limitation of "generating a main display level having a first geographical metaphor with picture icons, each said picture icon corresponding to a group of pictures in said picture database captured at a specific location in said first geographical metaphor."

9. Babin et al. show a second level linked to the main display having a second geographical metaphor, furthermore, added et al. show a second level linked to the main display having a second geographical metaphor, with corresponding icons in groups of icons in a database (Figs. 7, 8 column 11 lines 5-30) for greater specificity of details. It would have been obvious to a person with ordinary skill in the art to include this feature in the method of Shah et al.

because it would allow a convenient way to show specificity of details. The picture icon group obviousness then follows as above

Babin et al. merely discloses a baseline geographical system that allows a user to effectively zoom in and out of an image of a geographical area such as the continental United States (See Fig. 11). Babin et al., like Shah et al. and Torres et al., still fails show "generating a main display level having a first geographical metaphor with picture icons, each said picture icon corresponding to a group of pictures in said picture database captured at a specific location in said first geographical metaphor." In Babin et al. a user can zoom in to a point wherein images of individual attractions in an area are disclosed. However, Babin et al. fails to show picture icons each representing a group of pictures in a picture database at the first geographical metaphor as is claimed (or at any other geographical metaphor). When this is combined with Shah et al. and Torres et al., the combination merely yields a vehicle tracing system having pictures of vehicles shown with the rasterized image being capable of being zoomed in (or out).

Babin et al. further does not show a second level having picture icons corresponding to a group of pictures in the database captured at a specific location in said second geographical metaphor. Fig. 11 of Babin et al. shows an example of multiple level display of images. In not one of the multi-level displayed images is an icon showing a group of images. For example, when a user zooms in from the level shown in Fig. 11D to the level shown in Fig. 11E, there is absolutely no indication that a group of pictures(or even one picture) is associated with that zooming step. There is no teaching or suggestion that at any other step in the zooming in process shown in Fig. 11A - 11E there is a presentation of an icon indicating that even one picture is available for viewing.

Specifically, Babin describes with respect to Figs. 6 – 8:

> *In FIG. 6, a user wishing to locate a particular country activates the COUNTRY pushbutton 212, causing a COUNTRIES list box 82 to pop up on the screen to provide listing of possible choices for countries, as a visual aid to the user. If, for example, "United States" is chosen as the country of interest, the view of the virtual globe 22 rotates to center the United States of America in the screen and distinguish it either by highlighting the country or fading the remainder of the image. Simultaneously, the country of interest will be highlighted on the physical globe 30, of FIGS. 1 and 2. The highlighting of the physical globe 30 is synchronized*

with the highlighting of the virtual globe 22. Highlighting of the virtual globe 22 will be followed by display of the country map 90 as shown in FIG. 7 while the country is still highlighted on the physical globe 30.

At different zoom levels, a number of menu choices are available and additional menus can be added. When the country map 90 is displayed, the menu changes to include a STATE button 215 for selection of states, a CITY button 216 for selection of cities within the state, a FEATURE button 217 for selection of geographical features within the city or state, and BACK button 218 to activate command functions which would return the view to the previous detail level. The STATE button 215 would be replaced by other political divisions of a country if a country other than the USA is selected, for example a PROVINCE button is used if the selected country is Canada.

The process can be repeated at further levels. For example, if the user chooses a STATE from the options provided by the menu buttons, a list box of STATES names 83 appears to choose from, as shown in FIG. 8. The menu can include other desired criteria for each state such as the phonetic spelling of the state, as illustrated in FIG. 8. FIG. 9 shows the highlighting of the State of Louisiana 831, should Louisiana be selected from the state list box 83. This will be followed by displaying a map 91 of the selected state as shown in FIG. 10. Another change in the specifications of menu 21 will take place. The buttons will change to PARISH/COUNTY button 219 for selection of a parish, county or other type of region within the state, a CITY button 220 for selection of cities within the state, a FEATURE button 221 for selection of geographical features within the state, and BACK button 222 to activate command functions which would return the view to the previous detail level.

The zooming and panning aspects of the system are illustrated in FIG. 11 showing the generation of magnified maps and specified scenes through an example. FIG. 11 shows zooming from the overall world model 22 to focus on the United States 90, then to zoom in further to reveal the map highlighting the state of Louisiana 91, next to zoom in and focus on a map of New Orleans 92, and then to show images of particular attractions which pertain to Louisiana and New Orleans such as the streetcar 93.

It is important to note that one need not specify every step in the sequence to zoom in on a particular detail. For example, to zoom in on New Orleans, one need not specify that the view should go through a sequence from the global view, to the view of the United States, to Louisiana, and then to New Orleans. Instead, the user can specify New Orleans and the view would automatically begin zooming in until the required level of detail is achieved. A list of possibilities appears to choose from, in cases wherein more than one location exists for a given phrase or name, for example, Alexandria, Minn.; Alexandria, La.; Alexandria, Va.; and Alexandria, Egypt.

Nowhere in this discussion is described the step of:

generating at least a second display level light to said main display level, said second display level having a second geographical metaphor for greater geographical specificity and said first geographical metaphor with picture icons, each said picture icon corresponding to a group of pictures in said picture database captured at a specific location in said second geographical metaphor.

Accordingly, claim 1, and all claims that depend from claim 1 are believed to be a condition for allowance.

II. Claims 16 – 30:

Claim 16-30 are rejected for the following reasons: "claims 16-30 show the same features as above and are rejected for the same reasons." Without accepting this assessment of what is claimed in claims 16 -30, the applicants respectfully submit that the arguments presented above have traversed the stated reasons for rejecting claim 1 and accordingly claims 16 – 30 are believed to be in a condition for allowance.

CONCLUSION

Accordingly all claims are believed to be a condition for allowance, prompt notice of which is earnestly solicited.

Respectfully submitted,

Attorney for Applicant(s)
Registration No. 40,802

Roland R. Schindler, II/jrk
Rochester, NY 14650
Telephone: 585-588-2736
Facsimile: 585-477-1148